

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
(Southern Division)

IN RE: QUALITY STORES, INC., ET AL.

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U.S. DISTRICT COURT
WEST. DIST. OF MICH.
Chapter 11
Case No. GG-01-10662
(Jointly Administered)

QSI HOLDINGS, INC. and QUALITY
STORES, INC.,

Plaintiffs,

v.

DAVID C. BLISS, et al.,

Defendants.

Hon. James D. Gregg

Adversary Proceeding
No. 03-88076

Oral Argument
Requested

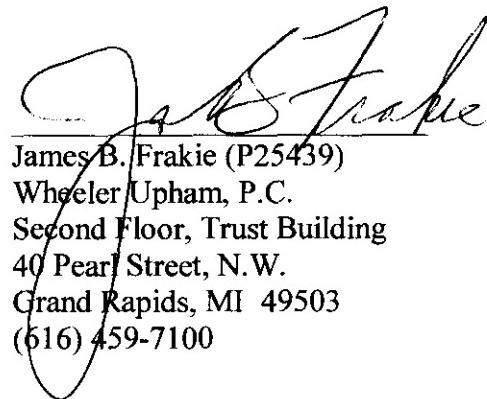
**MOTION OF DEFENDANTS PETER LAMM AND RICHARD C. DRESDALE
TO DISMISS COMPLAINT**

Now come the Defendants, Peter Lamm and Richard C. Dresdale, and move this Court, pursuant to Federal Rule of Civil Procedure 12(b) and Federal Rule of Bankruptcy Procedure 7012(b), to dismiss the Complaint of QSI Holdings, Inc. and Quality Stores, Inc., in the matter captioned above, for failure to state a claim upon which relief can be granted.

In support of their Motion to Dismiss, Messrs. Lamm and Dresdale submit a memorandum in support of the Motion, the affidavit of James B. Frakie, and an appendix of unreported decisions.

WHEREFORE, Messrs. Lamm and Dresdale respectfully request that the Court dismiss the Plaintiffs' Complaint in its entirety with respect to Defendants Lamm and Dresdale, with prejudice, and order such other relief as the Court deems proper.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of April, 2003, a true copy of the above document was served by first-class mail, postage pre-paid, on:

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Attorney for Plaintiffs QSI Holdings,
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Chief Litigation Officer

Attorney for Co-Defendants


Timothy J. Casey